

Prescribed Product Disclosures
January 1, 2014 – December 31, 2014

Report of
Vermont Attorney
General William H. Sorrell
October 2015

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**Prescribed Product Disclosures:
Report of Vermont Attorney General William H. Sorrell
for Calendar Year 2014
October 2015**

I. Summary

This is the thirteenth report of Vermont Attorney General William H. Sorrell on Prescribed Product Disclosures. It is based upon disclosures of expenditure and sampling activity engaged in during the period of January 1, 2014, through December 31, 2014, by manufacturers of pharmaceuticals, biologics (e.g., vaccines) and medical devices (e.g., artificial hips, hearing aids, and scopes). Vermont's Prescribed Product Disclosure Law, 18 V.S.A. §§ 4631a, 4632, requires the Vermont Attorney General to issue an annual report about the disclosures.¹

Samples disclosures may only be reported to the public in aggregate form. Thus, while expenditure disclosures have been posted along with this report on the Attorney General's website, www.ago.vermont.gov, sample disclosures have not.

As always, changes in the law complicate the comparison of data from year to year. This is the second report to reflect the implementation of the Physician Payments Sunshine Provision (§6002) of the Patient Protection and Affordable Care Act (Pub. L. No. 11-148) ("ACA"). Some of Vermont's disclosure requirements are preempted by the ACA. While the gift ban and samples reporting are not affected, Vermont may not require manufacturers to disclose allowable expenditures and permitted gifts, including expenditures associated with clinical trials, which must be reported to the federal government under the ACA. The federal law is narrower than Vermont's law in several ways, however. For example, only physicians and teaching hospitals are covered recipients under the federal law. Therefore, manufacturers are still required to make all non-preempted disclosures regarding allowable expenditures and permitted gifts to other health care providers or other entities.

As a further complication, the federal law does not prohibit manufacturers from making preempted disclosures to states; it simply prohibits a state from requiring preempted disclosures. Thus, some manufacturers have reported expenditures to physicians and others have not. Because the disclosures to Vermont paint a less-than-full picture of the expenditure activity that took place in 2014, this report focuses on the data regarding samples distributed in Vermont,

¹ The information that forms the basis of this report comes solely from the disclosures of prescribed product manufacturers; the recipients of the disclosed gifts, expenditures, and samples have not had the opportunity to review the disclosures or confirm their accuracy. Moreover, by publishing the disclosures, the Attorney General makes no representation as to their accuracy or the legality of the underlying conduct.

places less emphasis than in the past on the expenditure figures, and does not purport to compare expenditure data year-to-year.

Manufacturers

The disclosures for 2014 reveal that 179 manufacturers reported distributing 45,549 samples and spending approximately 7.6 million dollars² with Vermont health care providers, institutions and organizations. Exhibit 1. Only 4 manufacturers distributed 3,000 or more samples, and 94 manufacturers disclosed no sample activity at all. Exhibit 1.

As in years past, pharmaceuticals dominated the percentage of the total number of samples distributed at 92% of prescribed products sampled (as compared with 73% in 2013, 87% in 2012 and 62.6% in 2011) followed by medical devices at 6.4% (compared with 18% in 2013, 11% in 2012 and 36.9% in 2011)[♦] and 0.3% for biologic products (compared with 0.3% in 2013, and 0.1% in 2012 and 2011). Exhibit 2.

The five manufacturers with the highest sample distribution during 2014 were: (1) Pfizer, (2) GlaxoSmithKline, (3) AstraZeneca, (4) Forest Laboratories, and (5) Eli Lilly. Exhibits 1 and 3. GlaxoSmithKline and Pfizer are the only manufacturers which have been in the top five for sampling for all four years of sample reporting. Exhibit 3.

The percentage of samples reported by the top five manufacturers by samples distribution, as compared with the total number of samples reported by all manufacturers, was 53% in 2014 (compared with 60% in 2013, 49% in 2012 and 44% in 2011). Exhibit 3.

Recipients

The number of health care providers accepting at least 250 samples and the total number of samples accepted by them has steadily decreased over the four years of sample reporting. A total of 18 health care providers received 8,000 samples in 2014, a figure that has steadily decreased from 52 health care providers receiving 40,000 samples in 2011. Exhibit 4.

For the last three years, the greatest amount of samples to health care providers who received 250 or more samples went to doctors specializing in Internal Medicine. In 2014, health care providers who received 250 or more samples were health care providers identifying their specialties or credentials as Internal Medicine (3,500 samples), Family Practice (2,700 samples), and Physician's Assistant (1,200 samples). Internal Medicine and Family Practice have been the

² As noted above, because the ACA preempts Vermont from requiring disclosure of certain categories of expenditures, this figure does not reflect all expenditures, for example, received by physicians and teaching hospitals.

top two specialties receiving samples since the law was amended to exclude prescription eyewear in 2012. Exhibit 4.

Products

The top fifty products by sample distribution were associated with the distribution of between 297 and 2,286 samples each. Of those, 46 (93%) were pharmaceutical products, and 4 (7%) were medical devices from Bayer HealthCare.♦ The ten products sampled most frequently in 2014 accounted for approximately 14,500 samples, or 32% of all samples distributed in 2014. Exhibits 1 & 5.

Looking only at primary indications of the 50 products with the greatest number of samples in 2014, the three most prevalent indications were Asthma, Erectile Dysfunction and Bipolar Disorder and/or Schizophrenia, which were associated with about 4,500, 3,600 and 2,500 samples respectively. Products treating Asthma have been in the top two products in all four years in which samples data has been reported. Exhibit 6.

Samples

Of the nearly 46,000 samples distributed in 2014♦ (Exhibit 1), more than 30,000 (67%) contained product, over 14,000 (31%) contained vouchers or coupons for free or reduced price product, and more than 2,900 (6%) contained other items, such as educational materials, non-prescribed items and cases/holders. Approximately 2,000 (4%) samples included two or more kinds of items (product, vouchers or other), while only 17 contained all three kinds of items. Exhibit 7.

II. Description of Vermont's Prescribed Product Gift Ban and Disclosure Law

The Vermont Legislature enacted the Pharmaceutical Marketing Disclosure Law in 2002, and has amended it periodically since then. In 2009, the legislature banned the distribution of most gifts and other expenditures, and mandated reporting of expenditures for biologics and medical devices, as well as expenditures relating to clinical trials and research, both effective with the FY11 report. The legislature also mandated reporting of the distribution of samples effective with the 2011 report. The law is now known as the Prescribed Products Gift Ban and Disclosure Law. Minor amendments were made to the law in other years.

The law in effect for the activity described in this report required manufacturers of prescribed products to report to the Vermont Attorney General's Office "the value, nature, purpose, and recipient information" of allowable expenditures and permitted gifts and the "recipient, number of units, and dosage" of samples distributed to Vermont health care providers and institutions. 18 V.S.A. §§4632(a)(1), (2).

Many kinds of expenditures are banned in Vermont. In particular, the law bans manufacturers from giving gifts (including food), defined generally as “anything of value provided for free to a health care provider.” 18 V.S.A. §§ 4631a(a)(5), (b)(1). Only the allowable expenditures and permitted gifts detailed as follows are exempt from this ban:

Allowable Expenditures:

- some payments associated with qualifying conferences or seminars;
- some expenditures associated with qualifying clinical trials and research projects;
- payment or reimbursement of reasonable expenses associated with technical training on medical devices;
- royalties and licensing fees;
- payments related to interviews for an employment opportunity or for health care services for employees; and
- other reasonable economic benefits provided at fair market value.

18 V.S.A. § 4631a(a)(1).

Permitted Gifts:

- samples of prescribed products or reasonable amounts of some over-the-counter products for free distribution to patients;
- free prescription or over-the-counter product or financial donations given to free clinics;
- prescribed products distributed through manufacturer patient assistance programs;
- short-term loans of medical devices;
- reasonable quantities of medical device demonstration or evaluation units;
- educational materials;
- scholarships for medical students, residents and fellows to attend qualifying conferences or seminars;
- some fellowship salary support payments;
- rebates and discounts for prescribed products provided in the normal course of business;
- FDA-approved drug labels; and
- coffee or other snacks or refreshments at a booth at a conference or seminar.

18 V.S.A. § 4631a(b)(2).

The following allowable expenditures and permissible gifts are exempt from disclosure:

- royalties and licensing fees;
- rebates and discounts for prescribed products;
- certain payments relating to clinical trials;
- interview of applicants or health care expenses of employees;
- coffee or other snacks or refreshments at a booth at a conference or seminar;

- certain loans of medical devices resulting in a purchase or lease of the device; and
- prescribed products distributed through patient assistance programs.

18 V.S.A. §§ 462(a)(1)(A), (a)(1)(B).

In 2009, the legislature eliminated the trade secret exemption which manufacturers had been permitted to claim in the past. However, disclosures of the distribution of samples as well as other products may only be reported to the public in aggregate form. 18 V.S.A. §§4632(a)(1)(B), (a)(1)(D), (a)(5). Thus, while expenditure disclosures have been posted along with this report on the Attorney General's Website, www.ago.vermont.gov, disclosures of the distribution of samples have not.

III. Enforcement

Vermont's Prescribed Product Gift Ban and Disclosure Law requires the Attorney General to include in this annual report "[i]nformation on violations and enforcement actions" brought pursuant to the statute's enforcement provision. 18 V.S.A. § 4632(a)(5)(B). During 2014, the Attorney General conducted several investigations into violations of the law. To date, the Attorney General has entered into 32 settlements resulting in payments by manufacturers of \$275,250.00. Copies of the settlement documents can be found on the Attorney General's Website: www.ago.vermont.gov.

*The 2014 data provided here shows a sharp decrease in the total number of sample disclosures due to an amendment to the Prescribed Products Disclosure law which excludes "prescription eye glasses, prescription sunglasses, or other prescription eyewear" from the definition of prescribed products. As a result of this amendment, the total number of samples reported is not directly comparable to previous years

Exhibit 1: Samples and Expenditures by Manufacturer, 2014

Rank by Number of Samples	Manufacturer	Number of Samples	Number of Expenditures**	Expenditure Total**
1	Pfizer Inc	7966	1023	\$885,178.00
2	GlaxoSmithKline	5515	133	\$698,725.56
3	AstraZeneca	3906	2	\$2,074.56
4	Forest Laboratories	3686	272	\$251,127.25
5	Eli Lilly	2841	64	\$910,633.00
6	Takeda Pharmaceuticals America	2545	53	\$117.52
7	Allergan	2033	45	\$150,085.51
8	Alcon Laboratories	1926	2	\$31,156.74
9	Merck Sharp & Dohme	1818	311	\$303,534.01
10	Bristol-Myers Squibb	1735	12	\$72,617.00
11	Daiichi Sankyo	1563	12	\$23,322.64
12	Novo Nordisk	1340	44	\$261,848.64
13	Purdue Pharma	1026	1	\$20,763.00
14	Sanofi-Aventis U.S.	775	20	\$20,588.00
15	Otsuka America Pharmaceuticals	771	11	\$5,952.00
16	Sunovion Pharmaceuticals	765		
17	Bayer HealthCare	682		
18	Valeant Pharmaceuticals International	569	112	\$34,495.00
19	Shire Pharmaceuticals	522	18	\$50,503.63
20	Teva Pharmaceuticals	392	13	\$5,163.75
21	3M	372	15	\$3,137.43
22	AbbVie	276	169	\$435,545.00
23	Actavis Pharma	271	2	\$28,770.00
24	Galderma Laboratories	179		
25	Salix Pharmaceuticals	171		
26	Boehringer Ingelheim Pharmaceuticals	157	32	\$121,901.55
27	Premier Dental Products	135	3	\$47.00

Exhibit 1: Samples and Expenditures by Manufacturer, 2014

Rank by Number of Samples	Manufacturer	Number of Samples	Number of Expenditures**	Expenditure Total**
28	Reckitt Benckiser Pharmaceuticals	134	184	\$4,928.00
29	Novartis Pharmaceutical	132	37	\$26,218.19
30	Roche Diagnostics Operations	108	17	\$5,584.79
31	Mylan Specialty	90	1	\$317.36
32	Lundbeck	86	49	\$29,775.26
33	Henry Schein	84	38	\$15,208.72
34	Wyeth/Pfizer	80		
35	Amgen	78	42	\$97,768.52
36	Merz North America	67	8	\$35,121.00
37	MSD Oss B.V.	66		
38	Becton Dickinson	40	3	\$4,872.29
39	Insulet	36		
40	Medline Industries	36	5	\$1,426.80
41	EMPI	35	11	\$8,685.00
42	Medtronic	34	149	\$90,372.97
43	B. Braun Medical	34	15	\$6,527.10
44	Sigma-Tau Pharmaceuticals	32		
45	Oticon	30	86	\$9,702.28
46	ASCEND Therapeutics US	29	35	\$39.80
47	Meda Pharmaceuticals	28		
48	Endo Pharmaceuticals	26		
49	Mylan Pharmaceuticals	26	4	\$3,513.72
50	UCB	26	3	\$2,268.00
51	Shionogi	26	17	\$26.25
52	Fisher & Paykel Healthcare	25		
53	Dr. Reddy's Laboratories	23	4	\$16,321.00

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Rank by Number of Samples	Manufacturer	Number of Samples	Number of Expenditures**	Expenditure Total**
54	Genzyme	21	8	\$10,921.00
55	Jazz Pharmaceuticals	20	1	\$2,638.67
56	Gilead Sciences	15	5	\$45,902.00
57	LEO Pharma	15		
58	Iroko Pharmaceuticals	14	4	\$3,606.00
59	Conmed	13		
60	Boston Scientific	11	57	\$202,017.39
61	Auxilium Pharmaceuticals	11	25	\$1,918.00
62	Greer Laboratories	8		
63	Avanir Pharmaceuticals	8	1	\$1,424.00
64	Ferring Pharmaceuticals	7	6	\$20,497.51
65	McKesson Medical-Surgical Minnesota Supply	6		
66	Kerr	6		
67	Eisai	6	10	\$40,065.00
68	Tandem Diabetes Care	5		
69	Ossur Americas	4		
70	ConvaTec	3	1	\$123.45
71	Merit Medical Systems	3		
72	PuraCap Pharmaceutical	3		
73	Nestle HealthCare Nutrition	3		
74	DUSA Pharmaceuticals	3		
75	Avid Radiopharmaceuticals (Eli Lilly)	2	2	\$8,972.00
76	PSS World Medical	2		
77	Smith & Nephew	2	52	\$131,623.56
78	Duchesnay USA	2	149	\$216.97
79	Depomed	2		
80	Coloplast	1		

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Rank by Number of Samples	Manufacturer	Number of Samples	Number of Expenditures**	Expenditure Total**
81	Hollister	1		
82	Ethicon	1		
83	Lineage Therapeutics	1		
84	Novartis Pharma AG	1		
85	Ironwood Pharmaceuticals	1		
*	3M ESPE Dental Products		1	\$1,674.58
*	Abbott Laboratories		601	\$33,450.70
*	Acclarent		1	\$694.00
*	ACE Surgical Supply		4	\$3,526.47
*	Actelion Pharmaceuticals US		13	\$316,723.00
*	Advanced Bionics		10	\$2,639.00
*	Aesculap Implant Systems		1	\$109.75
*	Alexion Pharmaceuticals		58	\$13,287.42
*	American Medical Systems		4	\$576.50
*	Anacor Pharmaceuticals		10	\$59,014.00
*	Animas		1	\$391.00
*	Arthrex		3	\$65.00
*	Astellas Pharma US		24	\$4,859.70
*	Baxter Healthcare		2	\$119,964.00
*	BD Rx		1	\$717.43
*	Benco Dental Supply		3	\$1,039.00
*	Biogen Idec		14	\$55,872.00
*	Biomet		1	\$6,162.00
*	Bio-Rad Laboratories		65	\$23,458.21
*	Biosense Webster		1	\$297.00
*	C. R. Bard		4	\$2,732.66
*	Cardinal Health		32	\$739.20
*	CareFusion		45	\$64,177.00
*	Celgene		23	\$60,533.53

Exhibit 1: Samples and Expenditures by Manufacturer, 2014

Rank by Number of Samples	Manufacturer	Number of Samples	Number of Expenditures**	Expenditure Total**
*	Cochlear Americas		25	\$1,375.01
*	Cook Medical		20	\$21,353.02
*	Cordis		1	\$4,332.00
*	Covidien		37	\$27,869.00
*	DePuy Orthopaedics		125	\$73,866.00
*	Draeger Medical		3	\$2,550.00
*	Edwards Lifesciences		28	\$7,097.74
*	EMD Millipore		76	\$5,949.00
*	Emergent Biosolutions		1	\$5.00
*	EndoChoice		11	\$2,955.00
*	Focus Diagnostics		2	\$438.00
*	Fresenius Medical Care		1	\$14.18
*	GE Healthcare		26	\$12,098.00
*	Grifosl USA		4	\$26,330.47
*	Guerbet		10	\$173,276.31
*	Haemonetics		17	\$3,537.93
*	Hill-Rom		6	\$2,990.74
*	Hospira		2	\$11,151.00
*	Impax Laboratories		2	\$7,553.00
*	Incyte		73	\$41,661.15
*	Integra Life Sciences		2	\$68.02
*	Intuitive Surgical		13	\$16,093.38
*	Janssen Biotech		19	\$28,874.89
*	Janssen Pharmaceuticals		56	\$321,094.86
*	Janssen Research & Development		10	\$34,029.25
*	Janssen Therapeutics		5	\$20,114.67
*	Johnson & Johnson Vision Care		2	\$5,210.00
*	Karl Storz Endoskope		471	\$3,360.77
*	KCI USA (Acelity)		6	\$622.00

Exhibit 1: Samples and Expenditures by Manufacturer, 2014

Rank by Number of Samples	Manufacturer	Number of Samples	Number of Expenditures**	Expenditure Total**
*	Kedrion Biopharma		6	\$111.24
*	LDR Spine USA		5	\$102.35
*	LifeScan		1	\$450.00
*	Mallinckrodt Pharmaceuticals		4	\$6,450.00
*	McKesson Medical-Surgical		2	\$462.63
*	McKesson Technologies		12	\$19,504.00
*	Medivation		1	\$538.00
*	Mentor Worldwide		1	\$1,642.00
*	Merck/Organon USA		36	\$3,432.12
*	Millennium Pharmaceuticals		40	\$105,309.26
*	Mylan Institutional		1	\$100.31
*	NPS Pharmaceuticals		1	\$3.00
*	NuVasive		1	\$0.00
*	Olympus Corporation of the Americas		28	\$17,085.03
*	Onyx Pharmaceuticals		42	\$13,610.39
*	Ortho Clinical Diagnostics		50	\$45,375.67
*	Ortho Organizers		3	\$992.47
*	Pacira Pharmaceuticals		2	\$74,756.49
*	Pharmacyclics		38	\$4,937.54
*	Philips Healthcare (a Division of Philips Electronics North America)		5	\$38,661.64
*	QIAGEN Sciences		1	\$76.00
*	Regeneron Pharmaceuticals		17	\$4,027.61
*	Retrophin		10	\$20.38

Exhibit 1: Samples and Expenditures by Manufacturer, 2014

Rank by Number of Samples	Manufacturer	Number of Samples	Number of Expenditures**	Expenditure Total**
*	Sanofi Pasteur		19	\$8,948.00
*	Seattle Genetics		67	\$32,682.00
*	Siemens Medical Solutions USA		2	\$5,750.00
*	Spectrum Pharmaceuticals		2	\$50.00
*	SPS Medical Supply (a subsidiary of Cantel Medical)		4	\$40.00
*	St. Jude Medical		103	\$23,797.70
*	Starkey Hearing Technologies		4	\$22,400.00
*	Straumann Manufacturing		1	\$2,376.10
*	Stryker		85	\$46,939.80
*	The Medicines Company		28	\$65,340.00
*	Theratechnologies		2	\$144.00
*	UNKNOWN MANUFACTURER		1	\$693.17
*	Valeritas		9	\$4,741.00
*	Vertex Pharmaceuticals		166	\$173,065.85
*	ViiVHealthcare		24	\$64,541.75
*	Vivus		2	\$255.71
*	W. L. Gore & Associates		8	\$7,396.00
*	Zimmer		28	\$33,895.65

Totals: **45,549** **6,236** **\$7,605,167.79**

* Manufacturer did not disclose any samples.

** Note that because the Affordable Care Act partially preempts Vermont's ability to require expenditure disclosures, the data in these columns is incomplete.

Exhibit 3: Top Five Manufacturers With Most Samples, 2011-2014

Rank by Number of Samples	2011	2012	2013	2014
1	CIBA Vision	AstraZeneca	AstraZeneca	Pfizer
2	Cooper Vision	GlaxoSmithKline	GlaxoSmithKline	GlaxoSmithKline
3	GlaxoSmithKline	Eli Lilly	Pfizer	AstraZeneca
4	Pfizer	Pfizer	Allergan	Forest Laboratories
5	Vistakon	Forest Pharmaceuticals	Abbott Laboratories	Eli Lilly and Company
Number of Samples for Top 5 Manufacturers	47,052	35,864	32,172	23,914
Percentage of Overall Sample Total Attributable to Top 5 Manufacturers	44%	49%	60%	53%

Exhibit 4: Samples by Specialty or Credential for Individual Health Care Providers who Received 250 or More Samples, 2011-2014

Specialty or Credential	2011		2012		2013		2014	
	Number of Samples	Rank						
Internal Medicine	7,423	2	8,363	1	7,763	1	3,497	1
Family Practice	6,136	3	6,086	2	4,720	2	2,721	2
Physician Assistant	2,011	4	2,597	3	1,565	3	1,230	3
Cardiovascular Disease	638	7	809	5	574	7	390	4
Endocrinology Diabetes and Metabolism	836	6	404	7	377	8	259	5
Optometrist	21,831	1	359	8	1,225	4		
Advanced Practice Registered Nurse (APRN)	279	8	626	6	900	5		
Critical Care Medicine	1,185	5	1,158	4	680	6		
Allergy and Immunology			255	11	263	9		
Ophthalmology					257	10		
Psychiatry			275	9	252	11		
Pediatrics			270	10				

Total Number of Samples:	40,339	21,202	18,576	8,097
Total Recipients:	52	43	40	18

Note: In 2012 the Vermont Legislature amended the Prescribed Product Gift Ban and Disclosure Law to exempt prescription eyewear.

Exhibit 5: Top Products - 50 Products with Greatest Number of Samples, 2014

Rank	Product Name	Manufacturer	Product Type	Primary Indication	Number of Samples
1	Advair	GlaxoSmithKline	Pharmaceutical	Asthma	2,286
2	Crestor	Astrazeneca	Pharmaceutical	Hyperlipidemia	2,099
3	Celebrex	Pfizer	Pharmaceutical	Osteoarthritis	1,503
4	Viagra	Pfizer	Pharmaceutical	Erectile Dysfunction	1,384
5	Multiple Products	Bayer HealthCare	Medical Device		1,336
6	Cialis	Eli Lilly	Pharmaceutical	Erectile Dysfunction	1,273
7	Symbicort	Astrazeneca	Pharmaceutical	Asthma	1,183
8	Eliquis	Bristol-Myers Squibb	Pharmaceutical	Stroke	1,175
9	Colcrys	Takeda Pharmaceuticals America	Pharmaceutical	Gout	1,127
10	Viibryd	Forest Laboratories	Pharmaceutical	Depressive Disorder	1,105
11	Oxycontin	Purdue Pharma	Pharmaceutical	Pain	957
12	Abilify	Bristol-Myers Squibb	Pharmaceutical	Schizophrenia	895
13	Bystolic	Forest Laboratories	Pharmaceutical	Hypertension	848
14	Benicar	Daiichi Sankyo	Pharmaceutical	Hypertension	820
15	Nexium	Pfizer	Pharmaceutical	Gastroesophageal Reflux Disease (GERD)	802
16	Abilify	Otsuka America Pharmaceuticals	Pharmaceutical	Schizophrenia	771
17	Strattera	Eli Lilly	Pharmaceutical	ADHD	762
18	Fetzima	Forest Laboratories	Pharmaceutical	Major Depressive Disorder	760
19	Dexilant	Takeda Pharmaceuticals America	Pharmaceutical	Erosive Esophagitis	721
20	Lyrica	Pfizer	Pharmaceutical	Neuropathic Pain	706
21	Linzess	Forest Laboratories	Pharmaceutical	Irritable Bowel Syndrome	676

Exhibit 5: Top Products - 50 Products with Greatest Number of Samples, 2014

Rank	Product Name	Manufacturer	Product Type	Primary Indication	Number of Samples
22	Lantus	Sanofi-Aventis	Pharmaceutical	Types 1 and 2 Diabetes	671
23	Flovent	GlaxoSmithKline	Pharmaceutical	Asthma	658
24	Ventolin	GlaxoSmithKline	Pharmaceutical	Bronchospasm	608
25	Levitra	GlaxoSmithKline	Pharmaceutical	Erectile Dysfunction	603
26	Nexium	Astrazeneca	Pharmaceutical	Gastroesophageal Reflux Disease (GERD)	570
27	Quillivant XR	Pfizer	Pharmaceutical	ADHD	542
28	Seroquel XR	Astrazeneca	Pharmaceutical	Schizophrenia	521
29	Levemir	Novo Nordisk	Pharmaceutical	Diabetes	517
30	Chantix	Pfizer	Pharmaceutical	Smoking Cessation	477
31	Tudorza Pressair	Forest Laboratories	Pharmaceutical	Bronchospasm	465
32	Januvia	Merck Sharp & Dohme	Pharmaceutical	Type 2 Diabetes	455
33	Contour Next Blood Glucose Test Strips and 10 MICROLET Colored Lancets	Bayer HealthCare	Medical Device	Blood Glucose Testing	444
34	MICROLET 2 Lancing Device and Contour Next Level 2 Control Solution	Bayer HealthCare	Medical Device	Blood Glucose Testing	444
35	Systane Balance 1.5ML SMP-USA	Alcon Laboratories	Pharmaceutical	Dry Eye	440
36	Systane Ultra 1.5ML SMP-USA	Alcon Laboratories	Pharmaceutical	Dry Eye	435
37	Detrol LA	Pfizer	Pharmaceutical	Overactive Bladder	434
38	Contour Next Blood Glucose Meter 9697	Bayer HealthCare	Medical Device	Blood Glucose Testing	422
39	Breo	GlaxoSmithKline	Pharmaceutical	Chronic Obstructive Pulmonary Disease	422
40	Victoza	Novo Nordisk	Pharmaceutical	Type 2 Diabetes	382
41	Dulera	3M	Pharmaceutical	Asthma	370
42	Latuda	Sunovion Pharmaceuticals	Pharmaceutical	Schizophrenia	360

Exhibit 5: Top Products - 50 Products with Greatest Number of Samples, 2014

Rank	Product Name	Manufacturer	Product Type	Primary Indication	Number of Samples
43	Novolog	Novo Nordisk	Pharmaceutical	Diabetes	351
44	Eliquis	Pfizer	Pharmaceutical	Nonvalvular Atrial Fibrillation	351
45	Cialis Daily	Eli Lilly	Pharmaceutical	Erectile Dysfunction	350
46	Nasonex	Merck Sharp & Dohme	Pharmaceutical	Allergic Rhinitis	348
47	Anoro	GlaxoSmithKline	Pharmaceutical	Chronic Obstructive Pulmonary Disease	345
48	Brintellix	Takeda Pharmaceuticals America	Pharmaceutical	Major Depressive Disorder	338
49	Xopenex	Sunovion Pharmaceuticals	Pharmaceutical	Reversible Obstructive Airway Disease	333
50	Lumigan Solution 0.01%	Allergan	Pharmaceutical	Glaucoma	297

Total: 36,142

Note: For purposes of this exhibit, when manufacturers disclosed a sample containing several different products, the Attorney General's Office assigned the sample to each of the products disclosed in connection with the sample. Where applicable, primary indication is according to the FDA.

Exhibit 6: Samples by Primary Indication of the top 50 Products with the Greatest Number of Samples, 2014

Primary Indication	2011		2012		2013		2014	
	Number of Samples	Rank						
Asthma	7,562	2	7,017	2	8,480	1	4,497	1
Erectile Dysfunction	1,184	14	5,308	3	1,788	13	3,610	2
Bipolar Disorder and/or Schizophrenia	1,261	12	4,516	4	2,083	8	2,547	3
Diabetes	1,365	11	3,014	7	3,306	4	2,376	4
Hyperlipidemia	2,300	5	4,204	5	4,970	2	2,099	5
Hypertension			4,054	6	2,805	6	1,668	6
Osteoarthritis	1,137	16	1,836	10	1,276	15	1,503	7
Gastroesophageal Reflux Disease (GERD)	634	23	2,994	8	3,128	5	1,372	8
Various: Multiple Products	1,436	10	950	19	3,378	3	1,336	9
Blood Glucose Testing							1,310	10
ADHD	1,147	15	1,496	13	862	19	1,304	11
Stroke					1,348	14	1,175	12
Gout	1,228	13	1,053	16	1,228	16	1,127	13
Depressive Disorder			7,721	1	1,874	10	1,105	14
Major Depressive Disorder							1,098	15
Bronchospasm			546	23	732	22	1,073	16
Pain					771	21	957	17
Eye Care	1,780	7	1,034	17	1,861	11	875	18
Chronic Obstructive Pulmonary Disease	993	18	2,011	9	2,483	7	767	19
Erosive Esophagitis	1,572	9	1,476	14	836	20	721	20
Neuropathic Pain	721	21	997	18	882	17	706	21
Irritable Bowel Syndrome					869	18	676	22
Smoking Cessation							477	23
Overactive Bladder	841	19	1,678	11	489	26	434	24
Nonvalvular Atrial Fibrillation							351	25

Exhibit 7: Contents of Sample by Category

2011

2012

2013

2014

Product

Product Only	78,620
Product and Vouchers	11,224
Product and Other	1,820
Product, Vouchers and Other	2,302
Total	83,966

Product

Product Only	48,607
Product and Vouchers	893
Product and Other	2,946
Product, Vouchers and Other	910
Total	53,356

Product

Product Only	46,862
Product and Vouchers	105
Product and Other	2,107
Product, Vouchers and Other	1,112
Total	50,186

Product

Product Only	28,786
Product and Vouchers	994
Product and Other	786
Product, Vouchers and Other	17
Total	30,583

Vouchers

Vouchers Only	6,550
Vouchers and Product	1,224
Vouchers and Other	293
Vouchers, Product and Other	2,302
Total	10,369

Vouchers

Vouchers Only	15,446
Vouchers and Product	893
Vouchers and Other	336
Vouchers, Product and Other	910
Total	17,585

Vouchers

Vouchers Only	16,361
Vouchers and Product	105
Vouchers and Other	246
Vouchers, Product and Other	1,112
Total	17,824

Vouchers

Vouchers Only	12,858
Vouchers and Product	994
Vouchers and Other	243
Vouchers, Product and Other	17
Total	14,112

Other

Other Only	1,268
Other and Vouchers	293
Other and Product	1,820
Product, Vouchers and Other	2,302
Total	5,683

Other

Other Only	3,617
Other and Vouchers	336
Other and Product	2,946
Product, Vouchers and Other	910
Total	7,809

Other

Other Only	1,164
Other and Vouchers	246
Other and Product	2,107
Product, Vouchers and Other	1,112
Total	4,629

Other

Other Only	1,865
Other and Vouchers	243
Other and Product	786
Product, Vouchers and Other	17
Total	2,911